



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JMM:SK
F. #2013R00948

*610 Federal Plaza
Central Islip, New York 11722*

April 22, 2015

By Email & ECF

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Re: United States v. Philip Kenner & Tommy C. Constantine
Criminal Docket No. 13-607 (JFB)

Dear Counsel:

Enclosed please find discovery provided by the government in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the discovery provided on January 16, 2014, January 23, 2014, February 10, 2014, March 6, 2014, March 11, 2014, March 24, 2014, April 11, 2014, May 21, 2014, June 6, 2014, August 6, 2014, August 15, 2014, August 20, 2014, August 22, 2014, August 27, 2014, August 28, 2014, August 29, 2014, September 2, 2014, September 11, 2014, September 12, 2014, September 19, 2014, October 2, 2014, February 20, 2015, February 25, 2015, February 28, 2015, March 3, 2015, March 5, 2015, March 17, 2015, April 6, 2015, April 10, 2015, April 14, 2015 and April 18, 2015.

Enclosed please find records obtained from Southwest Aviation Insurance (SAI 1-5), Aero Space Reports (ASR 1-16), and one additional email sent by defendant Constantine to John Doe 10 (DS 872). The government also provides

written notice that it intends to offer certain business records via certifications pursuant to Federal Rule of Evidence 902(11): Southwest Aviation Insurance (Apr. 21, 2015) (records: SAI 1-5); American Express (Apr. 21, 2015) (records: BNK-AMEX 1-2226); Fidelity Investments (Apr. 21, 2015) (records: BNK-FIMS 1-10); Johnson Bank (Apr. 22, 2015) (records: BNK-JB 1-2460); and Aero Space Reports (records: ASR 1-16). The government also notes that it has obtained certified copies of the corporate filings for Urban Expansion, LLC from the Secretary of State of Nevada. The government intends to offer these documents as self-authenticating under Federal Rules of Evidence 902(1), 902(2) and/or 902(4); the documents are available for inspection.

Please contact me or AUSA James Miskiewicz if you have any questions or requests.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/Saritha Komatireddy
Saritha Komatireddy
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Enclosures

cc: Clerk of the Court (JFB) (by ECF) (without enclosures)